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*Attorneys for Sonos, Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA,  
SAN FRANCISCO DIVISION

GOOGLE LLC,  
  
Plaintiff and Counter-defendant,  
  
v.  
  
SONOS, INC.,  
  
Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA  
Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF CLEMENT  
ROBERTS IN SUPPORT OF SONOS,  
INC.'S ADMINISTRATIVE MOTION  
TO FILE UNDER SEAL RE ITS REPLY  
IN SUPPORT OF MOTION TO STRIKE  
PORTIONS OF GOOGLE'S EXPERT  
INVALIDITY AND  
NONINFRINGEMENT REPORTS**

1 I, Clement Roberts, declare as follows and would so testify under oath if called upon to do  
2 so:

3 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel  
4 of record to Sonos, Inc. (“Sonos”) in the above-captioned matter. I am a member in good  
5 standing of the Bar of the State of California. I make this declaration based on my personal  
6 knowledge, unless otherwise noted. If called, I can and will testify competently to the matters set  
7 forth herein.

8 2. I make this declaration in support of Sonos’s Administrative Motion to File Under  
9 Seal in connection with Sonos, Inc.’s Reply in Support of Motion to Strike Portions of Google’s  
10 Expert Invalidity and Noninfringement Reports (“Sonos’s Reply”).

11 3. Sonos seeks an order sealing the materials as listed below:

DOCUMENT	PORTIONS TO BE SEALED	DESIGNATING PARTY
Exhibit Y to the Declaration of Geoffrey Moss in Support of Reply (“Decl. of Moss”)	Portions in red boxes	Google and Sonos
Exhibit Y to the Declaration of Geoffrey Moss in Support of Reply (“Decl. of Moss”)	Portions in blue boxes	Sonos

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18 4. The portions of Exhibit Y outlined in red and blue boxes reference and contain  
19 Sonos’s confidential business information and trade secrets, including details regarding the  
20 architecture, technical operation of various products and research and development processes.  
21 The specifics of how these functionalities and processes operate is confidential information that  
22 Sonos does not share publicly. Additionally, some of the red-boxed portions of Exhibit Y include  
23 details regarding confidential agreements that are not public. Disclosure of this information  
24 would harm Sonos’s competitive standing by giving Sonos’s competitors highly sensitive  
25 information about Sonos’s business dealings with other entities. A less restrictive alternative than  
26 sealing the portions of Exhibit Y to Sonos’s Reply, as indicated in the table above, would not be  
27 sufficient because the information sought to be sealed is Sonos’s confidential business  
28 information and trade secrets and is integral to Sonos’s legal arguments.

1  
2 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
3 knowledge. Executed this 17th day of February, 2023 in Belevedere, California.  
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5 /s/ Clement S. Roberts

6 Clement Seth Roberts  
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